

McGuireWoods LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202-2146
Phone: 704.343.2000
Fax: 704.343.2300
www.mcguirewoods.com

T. Richmond McPherson III
Direct: 704.343.2038

McGUIREWOODS

rmcpherson@mcguirewoods.com

April 28, 2022

VIA ELECTRONIC FILING

Ms. Jocelyn Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Piedmont Natural Gas Company, Inc.
Docket No. 2022-____-G

Dear Ms. Boyd:

Enclosed please find the Petition of Piedmont Natural Gas Company, Inc. for Approval to Suspend Routine Meter Testing for the Remainder of 2022 in the above-captioned docket.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ T. Richmond McPherson III
T. Richmond McPherson

TRM/bms

cc: ORS
Carri Grube Lybarker
Bruce Barkley
Pia Powers

**BEFORE THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2022-__-G

In the Matter of)	
)	
Petition of Piedmont Natural Gas Company, Inc.)	
to Suspend Routine Meter Testing for the)	PETITION
Remainder of 2022)	
)	

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), through counsel and pursuant to Rules 103-825 and 103-475 of the Rules and Regulations of the Public Service Commission of South Carolina (“Commission”), hereby requests approval by the Commission to be relieved of its obligation for the remainder of 2022 to conduct its routine meter testing for residential and commercial meters. In support of this Petition, Piedmont respectfully shows unto the Commission as follows:

1. It is respectfully requested that any notices or other communications with regard to this Petition be sent to:

T. Richmond McPherson III
McGuireWoods LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2038
Email: rmcpherson@mcguirewoods.com

and

Brian S. Heslin
Deputy General Counsel
Duke Energy Corporation
550 S. Tryon Street
Charlotte, NC 28202
Telephone: 980-373-0550
Email: brian.heslin@duke-energy.com

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

3. Pursuant to Rule 103-475, Piedmont engages in routine testing of its in-service meters, selected through statistical sampling, to ensure that they are achieving overall accuracy. This statistical periodic meter sampling program (“Statistical Meter Sampling Program” or “Program”) is in addition to meter testing that is required at various times by Commission Rules.

4. Piedmont’s Statistical Meter Sampling Program, as modified, was approved by the Commission on August 26, 2015 in Docket No. 2015-272-G.

5. The Program tests active meters that are serving customers which are at least ten years old and which have not otherwise been tested in the last ten years. Piedmont tests the meters by removing the active meter from the customer’s premise and performs tests on it in Piedmont’s centralized meter shop. At the same time the active meter is removed from the customer’s premise, a replacement meter is immediately installed in its place. After the replacement meter is installed, a Piedmont employee enters the customer’s home or business to relight pilots and perform safety checks to ensure that no leaks are present.

6. Every residential and commercial meter on Piedmont’s system currently contains an encoder receiver transmitter (“ERT”), a device that transmits the meter read to the Company for billing purposes. Silicone chips are a key material used in ERTs.

7. Meter testing requires the disposal of the old ERT and placement of a new ERT into the meter upon completion of testing.

8. Due to recent global supply chain issues related to silicone chips, Itron, Inc. (“Itron”), Piedmont’s supplier of ERTs, recently notified the Company that its supply of ERTs has been halted. As such, Itron is currently unable to supply ERTs to Piedmont. Itron predicts that it will be able to resume its supply of ERTs to Piedmont at the end of 2022. Therefore, Piedmont’s supply of ERTs is currently limited to the ERTs it holds in inventory.

9. Piedmont needs to conserve its current inventoried supply of ERTs in order to ensure its availability for the purposes of connecting new customers and maintaining service to existing customers whose existing ERT may need replacement. Accordingly, Piedmont requests authorization to suspend its routine meter testing activities pursuant to the Statistical Meter Sampling Program for the remainder of calendar year 2022. If Piedmont is not granted authorization to suspend its Statistical Meter Sampling Program, the Company predicts that its current supply of ERTs will be exhausted by sometime in May 2022.

10. Piedmont is currently evaluating other options to continue providing meters for new customers upon exhausting its current supply of ERTs.

11. Assuming the issues contributing to the current shortage of ERTs have been resolved by the end of 2022, Piedmont plans to resume the Program in 2023.

12. Piedmont has no cause for concern that suspension of the Program for calendar year 2022 will harm customers or increase the Company’s overall operational risk inasmuch as the Company’s experience is that our Statistical Meter Sampling Program has indicated that meters tested through that program were highly accurate.

13. Because the exhaustion of Piedmont's supply is imminent, Piedmont respectfully requests expedited resolution of the matter raised herein.

14. For all of the foregoing reasons, Piedmont respectfully requests authorization to immediately suspend its routine meter testing activities pursuant to the Program for the remainder of calendar year 2022.

WHEREFORE, Piedmont respectfully requests that the Commission grant expedited authorization for the Company to suspend routine meter testing activities pursuant to its Statistical Meter Sampling Program for calendar year 2022.

Respectfully submitted this 28th day of April, 2022.

Piedmont Natural Gas Company, Inc.

/s/ T. Richmond McPherson III
T. Richmond McPherson III
McGuireWoods LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2038
Email: rmcpherson@mcguirewoods.com

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

VERIFICATION

Pia Powers, being duly sworn, deposes and says that she is Managing Director
- Gas Rates & Regulatory of Piedmont Natural Gas Company, Inc., that as such, she
has read the foregoing documents and knows the contents thereof; that the same are
true of her own knowledge except as to those matters stated on information and belief
and as to those she believes them to be true.

Pia Powers

Pia Powers

Mecklenburg County, North Carolina

Signed and sworn to before me this day by Pia Powers

Date: 04/27/2022

Notary Public

(Official Seal)

My commission expires: 05/02/2023

O'Hagi M. McGriff
Notary Public
Mecklenburg County, NC
My Commission Exp 05/02/2023